

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

IN THE MATTER OF THE EXTRADITION OF )  
MARIANNE SMYTH ) 1:24-mc-00084-JCN  
)  
)

**DEFENDANT’S RESPONSE TO GOVERNMENT’S MEMORANDUM OF LAW IN  
SUPPORT OF EXTRADITION**

NOW COMES the Defendant, Marianne Smyth, by and through her attorneys Vafiades, Brontas & Kominsky, LLP, and agrees with the outline of what the procedure is for this Court. The Defendant also agrees that the allegations outlined in the background information are the allegations that Northern Ireland is making against the Defendant although she disagrees that she is guilty of them and committed any of the offenses.

**A. Fraud and Theft**

There is not probable cause to believe the Defendant committed the alleged offenses. The government’s outline of what the meaning of probable cause in its memorandum is correct and the defense has found no other additional case law to cite to aid the Court in that determination.

**CONCLUSION**

We would respectfully request they conduct a hearing pursuant to 18 U.S.C. §3184 to determine whether the evidence presented is sufficient to sustain the charge under the provisions

of the Treaty and to certify Smyth's extradition to the United Kingdom for the Secretary of State's surrender decision.

Dated this 3<sup>rd</sup> day of April, 2024

/s/ Kaylee J. Folster, Esq.  
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UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2024, I electronically filed the *Defendant's Response to Government's Memorandum of Law in Support of Extradition* with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following: AUSA Joel B. Casey. I hereby certify that on April 3, 2024, I have mailed by United States Postal Service, the document(s) to the following non-registered participants: Marianne Smyth, c/o Piscataquis County Jail, 52 Court Street, Dover-Foxcroft, ME 04426.

/s/ Kaylee J. Folster, Esq.  
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